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7 Attorney for Vernell Marshall

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 VERNELL MARSHALL,

15 Defendant.  
16

Case No. 2:18-cr-276-JAD-GWF

**UNOPPOSED MOTION TO**  
**CONDUCT A PRE-PLEA**  
**PRESENTENCING**  
**INVESTIGATION REPORT AND**  
**PROPOSED ORDER**

17 Appointed counsel, Raquel Lazo, Assistant Federal Public Defender, respectfully  
18 requests that a pre-plea presentence investigation report be prepared by the Department of  
19 Probation.

20 1. The parties need more clarity regarding Mr. Marshall's prior convictions  
21 in order to determine how those convictions ultimately affect his sentencing range. Whether  
22 Mr. Marshall is subject to any potential sentencing enhancements will drastically impact his  
23 sentencing exposure, negotiations, and Mr. Marshall's decision as to how he should proceed.  
24 A pre-plea presentence investigation report will promote judicial economy and aid in the  
25 manner in which this case is ultimately resolved.  
26

1                   2.       Undersigned counsel therefore respectfully requests this Court issue an  
2 order that the Department of Probation conduct a pre-plea presentence investigation report as  
3 soon as possible.

4                   3.       Undersigned counsel has spoken to the prosecutor, Assistant United  
5 States Attorney Brian Whang, regarding this request and he has no opposition. The Department  
6 of Probation has also been made aware that this request is forthcoming. They are requesting at  
7 least 60 days to complete the report.

8                   DATED this 17<sup>th</sup> day of December, 2018.

9                                   RENE L. VALLADARES  
10                                  Federal Public Defender

11                               By: /s/ Raquel Lazo

12                                  RAQUEL LAZO  
13                                  Assistant Federal Public Defender  
14                                  Attorney for Vernell Marshall

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 VERNELL MARSHALL,

7 Defendant.

Case No. 2:18-cr-276-JAD-GWF

**ORDER**

10 IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Plea  
11 Presentence Investigation Report on Defendant Vernell Marshall.

12 DATED this the 18th day of December, 2018.

13  
14  
15   
16 UNITED STATES MAGISTRATE JUDGE